

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No. 2:22-cv-1588

\$265,537.37 FROM CLEARVIEW FEDERAL
CREDIT UNION ACCOUNTS ENDING IN
0007 AND 10000

\$131,979.05 FROM CENTURY HERITAGE
FEDERAL CREDIT UNION ACCOUNT
ENDING IN 8009,

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Jeffrey R. Bengel, Assistant United States Attorney for the Western District of Pennsylvania, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of the following property (collectively the “Defendant Property”) pursuant to 18 U.S.C. § 981(a)(1)(C):
 - a. \$265,537.37 from Clearview Federal Credit Union Accounts ending in 0007 and 10000 (CATS 23-USS-000010), and
 - b. \$131,979.05 from Century Heritage Federal Credit Union Account ending in 8009 (CATS 23-USS-000011).
2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. §§ 1395 and 1355.

3. In a so-called romance scam, an individual adopts a fake online identity to gain a victim's affection and trust. The scammer then uses the illusion of a romantic or close relationship to manipulate the victim. In some cases, the victim is induced to part with their own funds under false pretenses, or to transfer funds that have been fraudulently obtained from others.

4. In a so-called government impersonation scam, a scammer impersonates a government official or law enforcement agent, in order to manipulate the victim into certain conduct. In some cases, the victim is induced to part with their own funds under false pretenses, or to transfer funds that have been fraudulently obtained from others.

5. Between June 1, 2020 and August 31, 2020, scammers were also filing fraudulent applications for various kinds of emergency pandemic benefits, including those provided by the Pandemic Unemployment Assistance program, the Economic Injury Disaster Loan program, and the Paycheck Protection Program. Scammers often used victims of romance scams, government impersonation scams, and other individuals to transfer and launder the proceeds of these fraudulent applications.

6. Between June 1, 2020, and August 31, 2020, proceeds of romance scams, government impersonation scams, and pandemic relief fraud were sent to an individual with initials H.W. via check, wire transfer, and direct deposit. Acting under instructions received through a romance scam, H.W. deposited these funds into the accounts below, with the intention of transferring them to others, including the individual giving him directions. These checks, wire transfers, and direct deposits were sent using interstate wires, the United States mail, and/or interstate commercial carriers.

7. Accordingly, funds contained in each of the accounts below represent property which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. §§ 1341 and 1343.

8. Records reveal that Clearview Federal Credit Union Accounts ending in 0007 and 10000 were opened in the name of H.W. On or about November 1, 2022, pursuant to federal seizure warrants, funds in those accounts in the amount of \$265,537.37 were seized.

9. Records reveal that Century Heritage Federal Credit Union Account ending in 8009 was opened in the name of H.W. On or about November 1, 2022, pursuant to a federal seizure warrant, funds in that account in the amount of \$131,979.05 were seized.

10. By reason of the foregoing, the Defendant Property is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, the United States respectfully requests that process of a warrant *in rem* issue for the arrest of the Defendant Property; that judgment of forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

CINDY K. CHUNG
United States Attorney

/s/ Jeffrey R. Bengel
JEFFREY R. BENDEL
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Pittsburgh, PA 15219
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VERIFICATION

I am a Special Agent of the United States Secret Service, and the case agent assigned the responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct. Executed on this 9th day of November, 2022.

/s/ Michael Ponzurick
Michael Ponzurick, Special Agent
United States Secret Service